

RAYMOND AND RAYMOND

ATTORNEYS AT LAW
7 GLENWOOD AVENUE, 4th FLOOR, STE. 408
EAST ORANGE, NEW JERSEY 07017

TELEPHONE: (973) 675-5622
TELEFAX: (408) 519-6711

Additional Office:

416 RAHWAY AVENUE, ELIZABETH, NJ 07207

Herbert B. Raymond, ESQ.
Jeffrey Raymond, ESQ.
Kevin DeLyon, ESQ.

*ON THE WEB AT: WWW.BANKRUPTCYLAW123.COM

December 8, 2024

RESPONSE TO TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

IN RE: Michele E McNair
CASE # 24-20152-CMG
HEARING DATE : December 18, 2024 at 10:00 am

Please accept this letter as my reply to the trustee's objection to confirmation of the case and plan.

- * The debtor has supplied the trustee with a statement of the employee purchased stocks (Sysensqo NV) as of October 2024.
- * The debtor has supplied bank statements for the Bank of America account as of October 2024.
- * The debtor has supplied bank statements for the Navy FCU accounts as of October 2024.
- * The debtor does not object the trustee amending the order of distributions, relating to the plan, as long as attorney legal fees are paid as an administrative priority claim in full prior to other claims being paid besides trustee commissions.
- * The debtor is paying all disposal income into the chapter 13 plan. The debtor has a small retirement loan that ends in month 33 of the chapter 13 plan. The debtor proposes an increased trustee payment in month 33, of the plan, to adjust for her additional disposable income after the retirement loan completes.
- * The debtor has made the trustee payment for the month of November 2024 and the trustee has posted the payment. The debtor has scheduled the payment for December 2024 already which is pending. The debtor is current with all required trustee payments.
- * For the above reasons, the debtor's chapter 13 plan should be confirmed by the court as proposed. The trustee's objection should be denied.

Submitted by,

/s/ Herbert B. Raymond, ESQ
HERBERT B, RAYMOND, ESQ. HR#1379
Counsel for Michele McNair